

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:22-CR-165
)	Hon. Michael S. Nachmanoff
HATCHET M. SPEED,)	Trial: January 17, 2023
)	
Defendant.)	

DEFENDANT'S PROPOSED JURY INSTRUCTIONS

Defendant, Hatchet M. Speed, respectfully requests that the Court include the following instructions in its charge to the Jury.

Respectfully Submitted,

HATCHET SPEED

by counsel:

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DEFENDANT'S PROPOSED DISPUTED JURY INSTRUCTION NO. A

The Essential Elements of the Offense Charged

In order to sustain its burden of proof for the crime of possession of an unregistered firearm silencer under 26 U.S.C. § 5861(d) as charged in Counts One to Three of the indictment, the government must prove the following four essential elements beyond a reasonable doubt:

- (1) The defendant knew he possessed the object;
- (2) The defendant knew the object was a silencer;
- (3) As designed or redesigned, the silencer was capable of operating to diminish the report of a portable firearm; and
- (4) The silencer was not registered to the defendant in the National Firearms Registration and Transfer Record.

Adapted From: Eighth Circuit Model Jury Instruction § 6.26.5861.” *United States v. Dukes*, 432 F.3d 910, 915 (8th Cir. 2006).